III. REMARKS

Claims 1-14 are pending in this application. By this amendment, claims 1, 8 and 12 have been amended. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1-14 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Chouinard (US patent no 6,671,701), hereafter "Chouinard," in view of Brandt et al. (US patent no 6,714,979), hereafter "Brandt." Applicants submit that the combined features of the cited art fail to teach each and every feature of the claimed invention. For example, with respect to independent claims 1, 8 and 12, the cited references fail to teach or suggest a stream of document messages. The file conversion synchronizer in Chouinard searches a specified source directory for files of a particular type and converts them into another type.

Col. 2, lines 59-64; col. 2, line 66 through col. 3, line 4. A time and date stamp of the files converted by Chouinard is stored in a database. Col. 3, lines 4-5. Chouinard then periodically searches the source directory and uses the time and date stamp in the database to determine whether a file in the source directory has been updated by comparing the time and date stamp of the file in the source directory against the one in the database. Col. 3, lines 5-9. Chouinard then converts the updated file into the desired file format. Col. 3, lines 9-11. However, under Chouinard, only one source file may exist in the source directory at any point in time. In contrast, the present invention includes "...a stream of inbound document messages." Claim 8.

09/702,127

This stream of inbound document messages is not a single file in a source directory as in Chouinard, but is instead a stream that may include multiple inbound messages concerning the same document. Thus, the stream of inbound document messages as included in the present invention is not equivalent to the file in a source directory in the cited references. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With further regard to independent claims 1, 8 and 12, the combined features of the cited art fail to teach or suggest receiving a stream of document messages. As stated above the file conversion synchronizer in Chouinard periodically searches the source directory for an updated files and converts the file if it is found. Col. 3, lines 4-9. Chouinard does not receive messages from an outside source, but instead searches a specific data source for the file. In contrast, the present invention includes "...receiving in the web-based application a stream of the document messages." Claim 1. That is, the stream of inbound document messages of the present invention is sent by an external source, such as the back office system of claim 1, and received by the web-based application, not a file that is searched for in a source directory for as in the cited references. Thus, receiving a stream of document messages as included in the present invention is not equivalent to periodically searching the source directory for updated files, as in the cited references. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With regard to the Office's other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims listed above. In addition, Applicants submit that all dependent claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these

rejections individually, but reserve the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

IV. CONCLUSION

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

Date: September 3, 2004

Ronald A. D'Alessandro

Reg. No.: 42,456

Hoffman, Warnick & D'Alessandro LLC Three E-Comm Square Albany, New York 12207 (518) 449-0044 (518) 449-0047 (fax)